



United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

December 20, 2019

BY CM/ECF

The Honorable Paul A. Engelmayer
United States District Judge
Southern District of New York
United States Courthouse
40 Foley Square
New York, New York 10007

Re: United States v. Ari Teman,
S1 19 Cr. 696 (PAE)

Dear Judge Engelmayer:

The Government writes to respectfully request that the Court modify defendant Ari Teman's conditions of release to prohibit Teman from having any contact, direct or indirect, with any potential trial witness, including but not limited to any individuals currently or formerly associated with Victim-1, Victim-2, Victim-3, or Victim-4, as defined in the Superseding Indictment.

The Government recently learned that on December 16, 2019, the defendant published an image on at least two social media platforms, Facebook and Instagram, disparaging a potential trial witness in this case, who is associated with one of the entities listed in the complaint ("Witness-1"). *See* Exh. A (Facebook post); Exh. B (Instagram story post). In the posts, Teman highlighted a news article referring to Witness-1, and Teman added in large text "scumbag who lied to have me arrested to avoid paying his bill(!) was just named #7 WORST LANDLORD IN NYC!!! (Out of thousands!)." Teman also wrote "#karma." In the Facebook post, Teman added "Maybe I'll sleep better tonight" with a smiling emoticon and a sleeping emoticon. The Government was alerted to the Facebook post by Witness-1 himself, who had seen the post. The Government further understands that Teman sent a photograph of the post to at least one other person.

The Government is concerned that the defendant's conduct is an effort to influence potential witnesses. Accordingly, the Government believes a modification of the terms of Teman's bail is warranted.

Respectfully submitted,

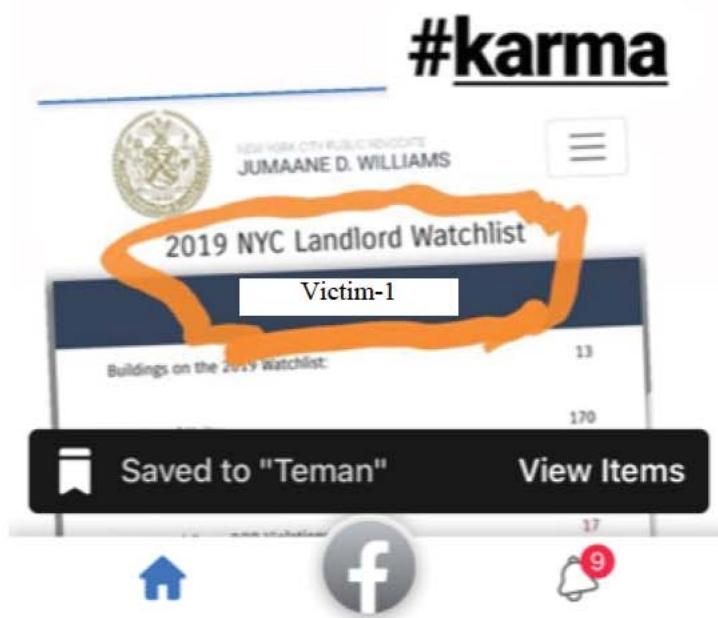
GEOFFREY S. BERMAN
United States Attorney for the
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By: /s/ Kedar S. Bhatia

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cc: Justin Gelfand, Esq.
Joseph DiRuzzo, Esq.

Exhibit A



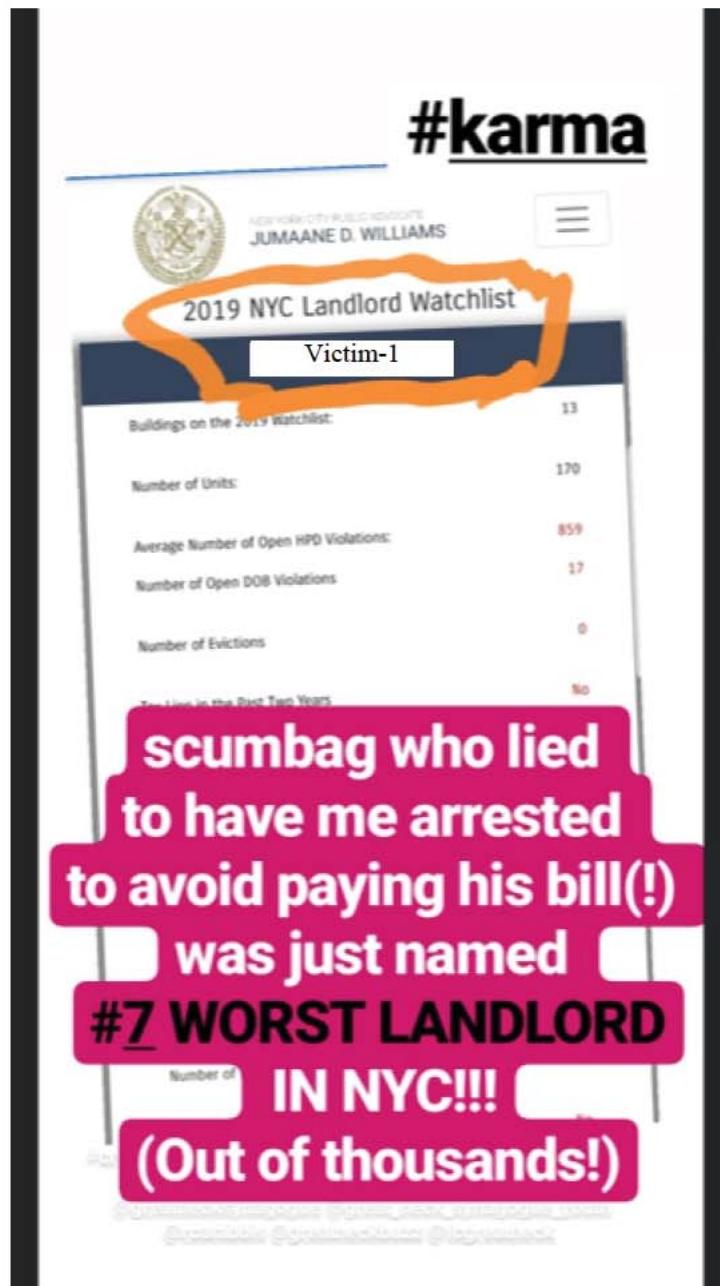


Exhibit B

